

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JONATHAN MONSARRAT,

Plaintiff,

v.

GOTPER6067-00001 and DOES 1-5,
dba ENCYCLOPEDIADRAMATICA.SE,
and BRIAN ZAIGER,

Defendants.

CIVIL ACTION NO.
1:17-cv-10356-PBS

**DECLARATION OF
TREY A. ROTHELL**

I, TREY A. ROTHELL, declare:

1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty.

2. I am employed as a paralegal for Randazza Legal Group, PLLC.

3. I have first-hand knowledge of the facts set forth herein, and if called as a witness, could and would testify competently thereto.

4. This Declaration is made in support of Defendant Brian Zaiger's Opposition to Plaintiff's Emergency Motion to Strike ("Defendant's Opposition"), filed herewith.

5. On October 23, 2017, I accessed a number of webpages and documents for the purposes of filing them in support of Defendant's Opposition.

6. At all relevant times, I accessed the documents and webpages from the offices of Randazza Legal Group, PLLC at 4035 S. El Capitan Way, Las Vegas, Nevada 89147.

7. At all relevant times, I accessed the documents and webpages using a MacBook Air laptop running the Google Chrome web browser.

8. Exhibit A to Defendant's Opposition is a true and correct copy of the webpage located at the URL <<http://hlrecord.org/2003/04/dating-service-creator-accused-of-harassing-students/>>, as it appeared on October 23, 2017.

9. Exhibit B to Defendant's Opposition is a true and correct copy of Exhibits 15 and 16 to the First Amended Complaint in the matter of *Monsarrat v. Filcman, et al.*, Case No. MICV2013-0399-C (Middlesex Cty. Sup. Ct., Mass. Apr. 30, 2013).

10. Exhibit C to Defendant's Opposition is a true and correct copy of the webpage located at the URL <<https://en.wikipedia.org/wiki/Pedobear>>, as it appeared on October 23, 2017.

11. Exhibit D to Defendant's Opposition is a true and correct copy of the webpage located at the URL <http://archive.boston.com/yourtown/news/somerville/2010/02/somerville_artist_arrested_for.html>, as it appeared on October 23, 2017.

12. Exhibit E to Defendant's Opposition is a true and correct copy of the webpage located at the URL <<https://www.dailydot.com/layer8/encyclopedia-dramatica-copyright-lawsuit/>>, as it appeared on October 23, 2017.

13. Exhibit F to Defendant's Opposition are a number of emails between counsel for Plaintiff and counsel for Defendant sent on or about October 23, 2017 concerning the instant motion.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23rd day of October 2017 at Las Vegas, Nevada.



Trey A. Rothell